



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, COLORADO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

2019 OCT -9 AM 10: 23

FILED
EPA REGION VIII
HEARING CLERK

OCT 09 2019

Ref: 8ENF-W-SD

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bryan and Judy Pownall, Owners
Bryan's Place
P.O. Box 75
Rozet, Wyoming 82727

Re: Addendum to Emergency Administrative Order under Section 1431 of the Safe Drinking Water Act, Bryan's Place Public Water System, PWS ID #WY5601477, Docket # **SDWA-08-2019-0034**

Dear Mr. and Ms. Pownall:

This is an Addendum to the Emergency Administrative Order (Emergency Order) issued to you on July 19, 2019. The purpose of this letter is to approve a schedule that outlines corrective actions to be taken to address the recent *E. coli* contamination at the System and to prevent future *E. coli* contamination. The schedule is hereby incorporated into the Emergency Order per paragraph 17 (page 3) of the Emergency Order. Each milestone is an enforceable provision of the Emergency Order.

Corrective Action

Completion Date

Fit the well head with a functioning sanitary seal and well cap that is tightly bolted and does not allow contamination to enter the well.	October 25, 2019
Send the EPA written documentation, including labeled photos, that a new well cap has been installed with a functioning sanitary seal.	October 26, 2019

Within 24 hours after completing corrective action, notify the EPA of the project's completion as required by the Emergency Order. If completing these corrective actions fails to correct and/or prevent *E. coli* contamination, the EPA may order further steps. The EPA is authorized to seek penalties if these deadlines are not met. If you have a reasonable basis to believe you may be unable to meet any deadline in the schedule, notify the EPA well in advance of the scheduled deadline to request an extension. The EPA may, in its discretion, consider granting an extension.

This Addendum to the Emergency Order does not diminish any obligations to other requirements of 40 C.F.R. part 141 (Drinking Water Regulations).

Enclosed for your information is an EPA Region 8 Drinking Water Unit Tech Tip, *Simple Fixes for Wellheads*.

Please contact Jill Minter at (303) 312-6084 or via email at minter.jill@epa.gov if you have any questions concerning this Addendum.

Sincerely,



Colleen Rathbone, Chief
Water Enforcement Branch

cc: Melissa Haniewicz, EPA Regional Hearing Clerk
WY DEQ/DOH (via email)
Judy Pownall, Co-owner and Administrative Contact (jpownall48@yahoo.com)
Tanya Willis, Bryan's Place (hunterbugg2004@yahoo.com)
Jon Cecil, Assistant Manager, WDA, Consumer Health Services (jon.cecil@wyo.gov)
Rebecca Dow, Inspection Specialist, WDA (Rebecca.dow@wyo.gov)
Kevin King, Public Works Executive Director, Campbell County (kck08@ccgov.net)
Campbell County Commissioners (RRB01@ccgov.net; MAC01@ccgov.net)

Enclosure



EPA Region 8 Drinking Water Unit Tech Tips

Simple Fixes for Wellheads

WELL CAP

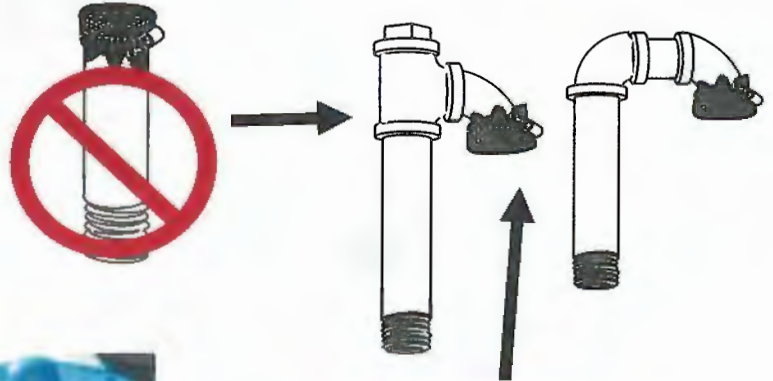
Tighten and replace any missing bolts to ensure a proper sanitary seal is created by the well cap.



Replace any damaged well cap gaskets between the top and bottom plate and/or the compression seals on the outside diameter of the well casing.

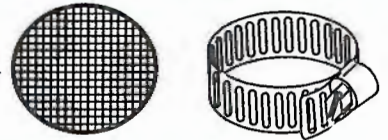
WELL VENTS

Well vents (if applicable) must be at least as high as the well casing or pitless adapter. Replace straight, open well vents with inverted screened vents such as those below. Use non-corrodible 24-mesh screen on all configurations of well vents to exclude insects, rodents and other small animals.



#24-MESH SCREEN

Non-corrodible 24-mesh screen (wire diameter 0.014 inches) and a stainless steel adjustable clamp



WELL HEIGHT

Permanent casing for all groundwater wells must project at least:

- 12 inches above the concrete floor; or
- 18 inches above natural ground surface.



PROPERLY DESIGNED WELL CAPS & SANITARY SEALS

Replace damaged or non-watertight well caps with vermin-proof, premium watertight wellhead caps. Vented caps must use #24-mesh screen.



NON-PREFERRED DRINKING WATER WELL CAPS

Well caps with set screws on the side of the cap may not have a sanitary seal gasket. They are not to be used on a drinking water well if a gasket is not part of the assembly.



FOR WELLS INSIDE A BUILDING

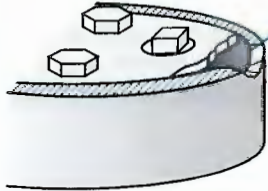
Eliminate rodents from the well house and the area around the wellhead. Airborne fecal material can contaminate the well or coliform samples. To keep rodents out, seal all entry points.



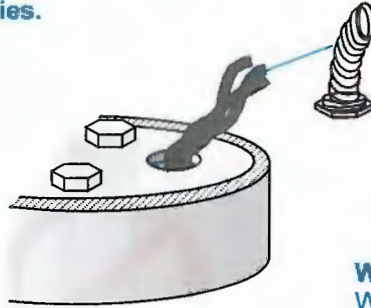
AVOID HANTAVIRUS: Please refer to the Center for Disease Control (CDC) Website regarding how to properly clean up mice infested areas to prevent contracting the Hantavirus pulmonary syndrome:

www.cdc.gov/ncidod/diseases/hanta/nps/noframes/prevent3.htm

Replace damaged seal and repair well casing. Repairs must be durable and watertight. Silicone is not an acceptable permanent fix for any well opening deficiencies.



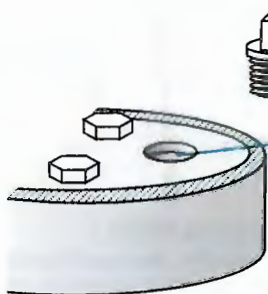
Install an appropriately sized conduit with an electrical grommet to seal the opening around the wires on a submersible pump. Silicone is not an acceptable permanent fix for any well opening deficiencies.



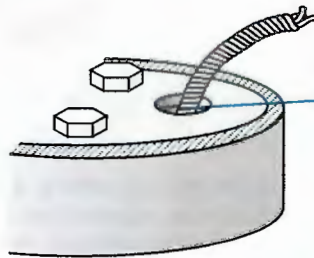
Well in a Pit or Vault

Wells in pits are not appropriate in areas prone to flooding or elevated water tables. The pit or vault should be watertight; however, when a well is located in a pit or vault that is not watertight, the pit or vault must be constructed with proper drainage or an appropriately sized permanent or portable pump shall be provided.

Replace access plug or install an inverted, screened well vent if one is not present. Silicone (or any other caulking) is not an acceptable permanent fix for any well opening deficiencies.



To seal the opening remove the rope, or attach it to an eyebolt on the sanitary seal bottom or drop pipe, and use an access plug. Silicone is not an acceptable permanent fix for any well opening deficiencies. Pump hoisting methods (rope, chain, etc.) extending through the well cap should be removed due to difficulty in providing adequate seal to prevent contaminants from entering the well through the opening. Pump removal can be accomplished per manufacturer's configuration recommendations. Afterwards, replace the opening with an access plug.



An electrical junction box shall be watertight (including at box attachment to the well casing and electrical conduits attached to the box) to prevent contaminants from entering the well. Replace damaged flexible conduit.

